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2014 JUL 25 PM 3:50

CASE UNSEALED PER ORDER OF COURT

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

September 2013 Grand Jury

14CR2124 DMS

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDUARDO ESCOBEDO-SILVA (1),  
aka "Emilio,"  
CHRIS QUANG DO (2),

Defendants.

Case No. \_\_\_\_\_

I N D I C T M E N T

Title 21, U.S.C., Secs. 952, 960,  
and 963 - Conspiracy to Import  
Marijuana; Title 18, U.S.C.,  
Secs. 1956(h) and 1956(a)(2)(A) -  
Conspiracy to Launder Money;  
Title 21, U.S.C., Sec. 853,  
Title 18, U.S.C., Sec. 982, and  
Title 28, U.S.C., Sec. 2461(c) -  
Criminal Forfeiture

The grand jury charges:

Count 1

Beginning no later than in or about May 2005 and continuing up to  
and including July 25, 2014, within the Southern District of  
California, and elsewhere, defendant EDUARDO ESCOBEDO-SILVA,  
aka "Emilio," did knowingly and intentionally conspire with other  
persons, known and unknown to the grand jury, to import 1000 kilograms  
and more of marijuana, a Schedule I Controlled Substance; into the  
United States from a place outside thereof; in violation of Title 21,  
United States Code, Sections 952, 960, and 963.

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ALB:nlv:San Diego  
7/23/14

Count 2

Beginning no later than in or about May 2005 and continuing up to and including July 25, 2014, within the Southern District of California and elsewhere, defendants EDUARDO ESCOBEDO-SILVA, aka "Emilio," and CHRIS QUANG DO did knowingly and intentionally conspire with each other, and with other persons known and unknown to the grand jury, to commit offenses against the United States under Title 18, United States Code, Section 1956, namely: transport, transmit and transfer monetary instruments and funds, that is United States currency, from a place in the United States to and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is the distribution of controlled substances, in violation of Title 18, United States Code, Section 1956(a)(2)(A); all in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 and 2 of this Indictment are realleged and by reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982.

2. As a result of the commission of the felony offenses alleged in Count 1 of this Indictment, said violations being punishable by imprisonment for more than one year and pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), defendant EDUARDO ESCOBEDO-SILVA, aka "Emilio," shall, upon conviction, forfeit to the United States all his rights, title and interest in any and all property constituting, or derived from, any proceeds any defendant

1 obtained, directly or indirectly, as the result of the felony offense  
2 alleged in this Indictment, and any and all property used or intended  
3 to be used in any manner or part to commit and to facilitate the  
4 commission of the violation alleged in this indictment.

5 3. As a result of the commission of the felony offense alleged  
6 in Count 2 of this Indictment, said violation being punishable by  
7 imprisonment for more than one year, and pursuant to Title 18, United  
8 States Code, Section 982(a)(1), defendants EDUARDO ESCOBEDO-SILVA,  
9 aka "Emilio," and CHRIS QUANG DO shall, upon conviction, forfeit to  
10 the United States all rights, title and interest in any and all  
11 property involved in such offense, and any property traceable to such  
12 property.

13 4. If any of the above-described forfeitable property, as a  
14 result of any act or omission of the defendants:

- 15 a. cannot be located upon the exercise of due diligence;
- 16 b. has been transferred or sold to, or deposited with, a  
17 third party;
- 18 c. has been placed beyond the jurisdiction of the Court;
- 19 d. has been substantially diminished in value; or
- 20 e. has been commingled with other property which cannot be  
21 subdivided without difficulty;

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1 it is the intent of the United States, pursuant to Title 21,  
2 United States Code, Section 853(p), as to Count 1, and Title 21,  
3 United States Code, Section 853(p), as incorporated by Title 18,  
4 United States Code, Section 982(b)(1) as to Count 2 to seek forfeiture  
5 of any other property of the defendant up to the value of the said  
6 property listed above as being subject to forfeiture.

7 All in violation of Title 21, United States Code, Section 853,  
8 Title 18, United States Code, Section 982 and Title 28, United States  
9 Code, Section 2461(c).

10 DATED: July 25, 2014.

11 A TRUE BILL:

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13   
Foreperson

14 LAURA E. DUFFY  
15 United States Attorney

16 By:

  
17 ADAM L. BRAVERMAN  
Assistant U.S. Attorney  
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